

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO**

SARA HAWES, individually, and on behalf  
of all others similarly situated,

Plaintiffs,

v.

MACY'S WEST STORES, INC.,

Defendant.

Case No.: 17-cv-00754

**JOINT MOTION TO EXTEND CERTAIN DEADLINES**

On March 31, 2020, the Court entered an Amended Calendar Order (ECF No. 77) setting dates for deadlines in this case. While the Parties have worked diligently and cooperatively on discovery (exchanged a significant amount of written discovery, correspondence and production documents and have schedule and taken depositions), more time is needed to complete discovery related to class certification (to exchange any remaining discovery and conduct three to five additional depositions). Covid-19 has also caused delays (it sadly and unfortunately took the life of two family members of one of the Plaintiffs' lawyers in this case). As a result, the Parties have conferred and respectfully seek an extension of time to complete deadlines (namely, thirty-five (35) additional days to complete depositions; and ninety (90) additional days to file class certification). The Parties do not intend to conduct additional written discovery during this added time period, and they agree to meet and confer about any additional written discovery that either side proposes during this time period. The Parties' current and proposed deadlines are as follows:

<b>Description</b>	<b>Deadlines Set By Court on March 31, 2020 (ECF No. 77)</b>	<b>New Date</b>
Fact discovery deadline:	October 30, 2020	December 4, 2020

Motion for class certification:	November 2, 2020	February 1, 2021
Plaintiff expert report(s)/designation(s) for class certification:	November 2, 2020	February 1, 2021
Plaintiff to produce all expert-related discovery:	November 9, 2020	February 10, 2021
Deposition(s) of Plaintiff's expert(s):	December 2, 2020	March 4, 2021
Response to class certification motion, including Daubert challenges relevant to class certification:	February 2, 2021	May 3, 2021
Rebuttal expert report(s)/designation(s) for class certification:	February 2, 2021	May 3, 2021
Plaintiff expert report(s)/designation(s) for trial:	February 2, 2021	May 3, 2021
Deposition(s) of Defendant's expert(s):	March 2, 2021	June 4, 2021
Defendant expert report(s)/designation(s) for trial:	March 2, 2021	June 3, 2021
Reply in support of class certification and, response to Daubert challenges relevant to class certification:	March 17, 2021	June 18, 2021
Expert discovery deadline:	April 1, 2021	July 1, 2021

Dispositive motion deadline:	April 17, 2021	July 15, 2021
Responses to dispositive motions:	24 days after dispositive motions filed	24 days after dispositive motions filed
Replies in support of dispositive motions:	17 days after responses to dispositive motions filed	17 days after responses to dispositive motions filed
Final pretrial conference in Cincinnati Chambers, Room 815:	August 9, 2021	October 2021
Jury Trial in Cincinnati, Room 805:	August 16, 2021	October 2021

Respectfully submitted,

/s/ Beth A. Bryan

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and accurate copy of the foregoing was filed electronically with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to counsel for the parties on this 19<sup>th</sup> day of October, 2020.

/s/ Beth A. Bryan